

Exhibit  
1

Grievance No.: 12.2.18

14-5B

## INMATE/RESIDENT GRIEVANCE

FULL NAME:	Joseph Dickerson		
NUMBER:	186877	HOUSING ASSIGNMENT:	G15-210

INFORMAL RESOLUTION ATTACHED (Not required for an emergency grievance)? ☐ YES ☒ NO

## GRIEVANCE CATEGORY (CIRCLE ONE):

1. Facility Staff	8. Dental Services	15. Housing
2. Access to Legal Materials	9. Mental Health Services	16. Laundry
3. Denied Access to Informal Resolution/Grievance Process	10. Trust Account	17. Recreation
4. Reprisal for Using Informal Resolution/Grievance Process	11. Commissary	18. Visitation
5. Safety/Security	12. Food Service	19. Programs-education, work, religious, etc.
6. Sanitation	13. Mail	20. Violations of federal or state regulations, laws, court decisions (i.e. ADA or Constitutional rights)
7. Medical Services	14. Intake	21. Other

STATE GRIEVANCE: (Include documentation, witnesses, date of incident, and any other information pertaining to the grievance subject. Attach additional pages if necessary).

DIRECTOR BRYAN STIRLING OF SOUTH CAROLINA DEPT OF CORRECTIONS HAS WILLFULLY AND KNOWINGLY ABUSED HIS DISCRETIONARY AUTHORITY BY ORDERING AN UNREASONABLE OUT-OF-STATE 700 mile away transfer which in FACT VIOLATES THE EQUAL PROTECTION AND DUE PROCESS CLAUSE OF THE FEDERAL CONSTITUTION. THIS TRANSFER IS A PUNISHMENT ORDERED BY THE DIRECTOR WITHOUT FAIR NOTICE OR HEARING. THIS IS MY SECOND ATTEMPT TO EXHAUST THIS MATTER AS THE FIRST GRIEVANCE TO THIS DAY HAS NOT BEEN RESPONDED TO WHICH WAS FILED AND HAND-DELIVERED TO SCDC OFFICIALS BEFORE ACTUALLY LEAVING THE STATE. ONCE THE FIRST GROUP OF INMATES WAS TRANSFERRED, I IMMEDIATELY FILED A GRIEVANCE PROTESTING THE TRANSFER OUT OF STATE. I FILED GRIEVANCE ON 6-20-18 ONE DAY BEFORE THE SECOND GROUP WAS TRANSFERRED. THE FIRST GROUP WAS TRANSFERRED ON 6-19-18. THIS TRANSFER HAS CAUSED UNFAIR PERSUASION, HARDSHIP TO MYSELF, FAMILY, AND ATTORNEY IN REGARDS TO VISITATION AND ONGOING LEGAL MATTERS.

Requested Action: (Attach additional pages if necessary)

THAT I IMMEDIATELY BE RETURNED TO S.C. medium institution WITH NO RETALIATION FROM THE DEPARTMENT OF CORRECTIONS OR THEIR OFFICIALS AND A PUBLIC ANNOUNCED APOLOGY TO CURE THE SLANDEROUS ALLEGATION THAT I AM "PROBLEMATIC."

Inmate/Resident's Signature: Joseph DickersonDate Submitted: 12/11/18

RECEIVED



Exhibit  
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Grievance No.: 12.1.18

14-5B

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<b>NUMBER:</b>	186877	<b>HOUSING ASSIGNMENT:</b>	G15-210

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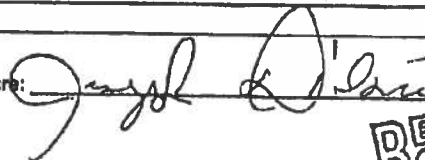
## "OUT-OF-STATE PRISON TRANSFER STATUTE"

S.C. Code of Laws, Section 24-10-20, Article IV. Procedures and Rights. (e) "All inmates who may be confined in a institution pursuant to this provision of this Compact SHALL be treated in a reasonable and humane manner and SHALL be treated equally with such similar inmates of the receiving state as may be confined in the same institution. The fact of confinement in a receiving state shall not be deprived any inmate so confined of any legal rights which the inmate would have had if confined in an appropriate institution of the sending state." Job Coordinator Ms. Carrel informed me that I will not be allowed to work outside the unit because of a nearly 30 year escape. Also, I'm classified as "High Security" when the sending state classified me as "medium" custody. I was employed as the "STAFF BARBER" and allowed to work outside the unit in the sending state. This is depriving me of equal treatment which is mandating by law of the sending state.

Requested Action: (Attach additional pages if necessary)

Classify my Custody as "Medium" and allow me to work outside the unit or send me back to the sending state...

Inmate/Resident's Signature:



Date Submitted: 12/11/2018

RECEIVED

Grievance No.: \_\_\_\_\_

14-5B

**RESPONDING STAFF MEMBER'S REPORT:** (Attach additional pages if necessary. All pages must include the grievance number.)


**RESPONDING STAFF MEMBER'S DECISION:** (Attach additional pages if necessary. All pages must include the grievance number.)

This is a South Carolina Issue
logged on 10/11/2018

Responding Staff Member's Printed Name: T. Brown Title: Co. C  
 Responding Staff Member's Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
 Inmate/Resident's Signature (upon receipt): \_\_\_\_\_ Date: \_\_\_\_\_

**INMATE/RESIDENT APPEAL** (Attach additional pages if necessary. All pages must include the grievance number.)


**WARDEN/ADMINISTRATOR'S DECISION:** (Attach additional pages if necessary. All pages must include the grievance number.)


Warden/Administrator's Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
 Inmate/Resident's Signature (upon receipt): \_\_\_\_\_ Date: \_\_\_\_\_



Exhibit  
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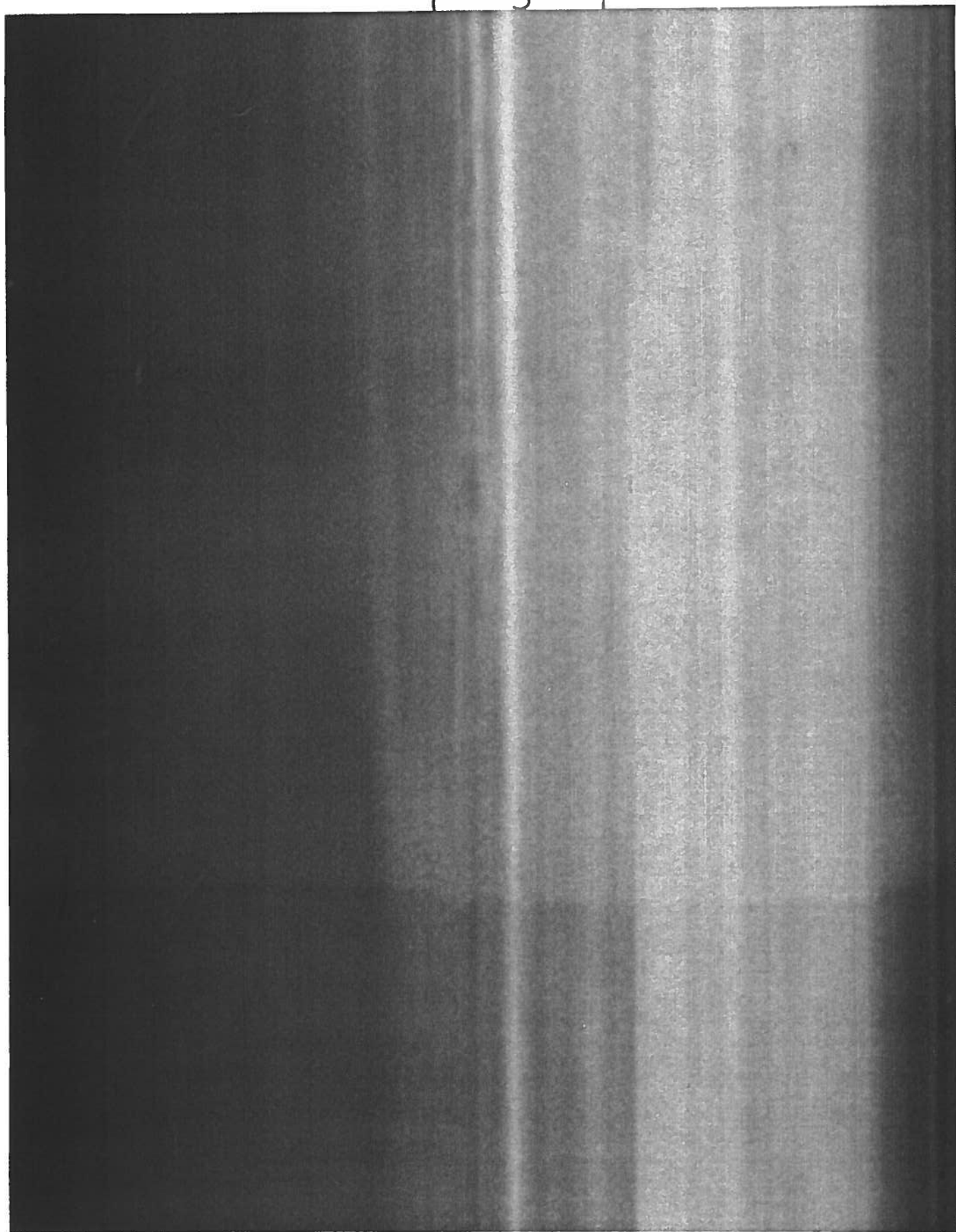


Exhibit  
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IN THE STATE OF MISSISSIPPI ]

COUNTY OF TALLAHATCHIE ]

**AFFIDAVIT**

Roderickus L. Bell

**Personally** appeared before me Roderickus Bell, who being duly sworn, with full knowledge and understanding of the penalty of perjury, swears that:

1. I am Roderickus Bell.
2. I am committed to the care and general population custody of South Carolina Department of Corrections after being convicted and sentence for violating its laws.
3. On June 18, 2018 I was transferred to Kirkland Correctional Institution located in Columbia, South Carolina.
4. On June 21, 2018 I was involuntarily transferred to Tallahatchie County Correctional Facility ("TCCF"), located in Mississippi.
5. Shortly, after arriving to TCCF, I'm being denied the opportunity to attend school, work and rehabilitative programs.
6. Im being confined to our living quarters designated only for those shipped from S.C. for 23 hours with 1 hour of recreation per day.
7. I am being charged sales tax on all items purchased from the canteen with stamps being an exception.
8. I have absolutely no writes since being committed. No-one in general population at S.C. prisons receives this type of treatment.
9. To this day, I have received no response to my S.C. grievances that was mailed to SCDC challenging this unfair and bias treatment/transfer.

**SWORN to and SUBSCRIBED** before meOn this 19th day of April, 2019.

Yalanda T. Hawkins  
NOTARY PUBLIC FOR MISSISSIPPI

My Commission expires: 4/15/2019**AFFIANT:** Roderickus Bell

Roderickus Bell #293109

TCCF

415 US Hwy 49 North

Uwiler, Mississippi 38963

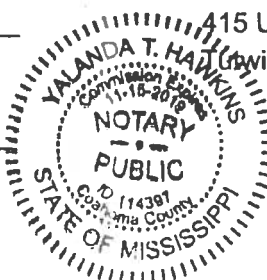


Exhibit  
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IN THE STATE OF MISSISSIPPI ]

COUNTY OF TALLAHATCHIE ]

**AFFIDAVIT**

David B. Harrell, Jr.

**Personally appeared before me David Harrell, who being duly sworn, with full knowledge and understanding of the penalty of perjury, swears that:**

1. I am David Harrell, Jr.
2. I am committed to the care and general population custody of South Carolina Department of Corrections after being convicted and sentence for violating its laws.
3. On November 26, 2018 I was involuntarily transferred to Tallahatchie County Correctional Facility ("TCCF"), located in Mississippi. Transfer took a week to arrive.
4. Shortly, after arriving to TCCF, I'm being denied the opportunity to attend school, work and rehabilitative programs.
5. I'm being confined to our living quarters designated only for those shipped from S.C. for 23 hours with 1 hour of recreation per day.
6. I am being charged sales tax on all items purchased from the canteen with stamps being an exception.
7. Only 1 (2012) write-up since committed to SCDC. No-one in general population at S.C. prisons receives this type of treatment.
8. To this day, I have received no response to my S.C. grievances challenging this unfair and bias treatment/transfer.

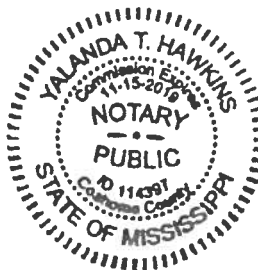
**SWORN to and SUBSCRIBED before me**

On this 11<sup>th</sup> day of April, 2019.

Yolanda T. Hawkins  
NOTARY PUBLIC FOR MISSISSIPPI

My Commission expires: 11/15/2019

**AFFIANT:** David B. Harrell Jr 260004  
David Harrell, Jr #260004  
TCCF  
415 US Hwy 49 North  
Tutwiler, Mississippi 38963



Exhibit

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IN THE STATE OF MISSISSIPPI ]

COUNTY OF TALLAHATCHIE ]

**AFFIDAVIT**

Andre M. Massey

**Personally** appeared before me Andre Massey, who being duly sworn, with full knowledge and understanding of the penalty of perjury, swears that:

1. I am Andre Massey.
2. I am committed to the care and general population custody of South Carolina Department of Corrections after being convicted and sentence for violating its laws.
3. On June 18, 2018 I was transferred to Kirkland Correctional Institution located in Columbia, South Carolina.
4. On June 21, 2018 I was involuntarily transferred to Tallahatchie County Correctional Facility ("TCCF"), located in Mississippi.
5. Shortly, after arriving to TCCF, I'm being denied the opportunity to attend school, work and rehabilitative programs.
6. Im being confined to our living quarters designated only for those shipped from S.C. for 23 hours with 1 hour of recreation per day.
7. I am being charged sales tax on all items purchased from the canteen with stamps being an exception.
8. Prior to this transfer, I had 2 write-ups since 2010. No-one in general population at S.C. prisons receives this type of treatment.
9. To this day, I have received no response to my S.C. grievances that was mailed to SCDC challenging this unfair and bias treatment/transfer.

**SWORN to and SUBSCRIBED** before meOn this 19<sup>th</sup> day of April, 2019.

Yamanda T. Hawkins  
NOTARY PUBLIC FOR MISSISSIPPI

My Commission expires: 11/15/2019**AFFIANT:**Andre Massey #229492

TCCF

415 US Hwy 49 North

Tutwiler, Mississippi 38963

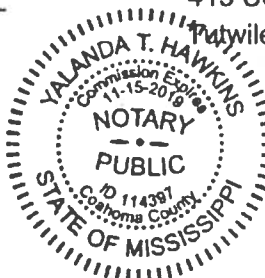




Exhibit  
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IN THE STATE OF MISSISSIPPI ]

COUNTY OF TALLAHATCHIE ]

**AFFIDAVIT**

Stanley R. Oliver

**Personally** appeared before me Stanley Oliver, who being duly sworn, with full knowledge and understanding of the penalty of perjury, swears that:

1. I am Stanley Oliver.
2. I am committed to the care and general population custody of South Carolina Department of Corrections after being convicted and sentence for violating its laws.
3. On June 18, 2018 I was transferred to Kirkland Correctional Institution located in Columbia, South Carolina.
4. On June 19, 2018 I was involuntarily transferred to Tallahatchie County Correctional Facility ("TCCF"), located in Mississippi.
5. Shortly, after arriving to TCCF, I'm being denied the opportunity to attend school, work and rehabilitative programs.
6. Im being confined to our living quarters designated only for those shipped from S.C. for 23 hours with 1 hour of recreation per day.
7. I am being charged sales tax on all items purchased from the canteen with stamps being an exception.
8. My last write-up prior to this transfer was in 2015. No-one in general population at S.C. prisons receives this type of treatment.
9. To this day, I have received no response to my S.C. grievances challenging this unfair and bias treatment/transfer.

**SWORN to and SUBSCRIBED** before me

On this 10th day of April, 2019.

Yalanda T. Hawkins  
NOTARY PUBLIC FOR MISSISSIPPI

My Commission expires: 11/15/2019

**AFFIANT:** Stanley Oliver

Stanley Oliver #192110

TCCF

415 US Hwy 49 North

Autwiler, Mississippi 38963

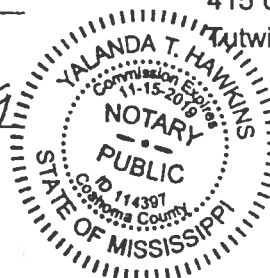


Exhibit  
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January 8, 2019

Joseph Dickerson #186877  
TCCF G15-210  
415 US Hwy 49 North  
Tutwiler, MS 38963

Bryan Stirling, Director  
SCDC  
4444 Broad River Rd  
Columbia, SC 29210

re: HARDSHIP TRANSFER

Director Stirling:

On June 18, 2018, I was selected as one of the 48 inmates that you sent to Mississippi. I don't know how you can stigmatize me as being problematic. I'm not a gang member, nor have I ever been in any gang. I'm completely confused with the procedures that was used to select me as a trouble-maker. I haven't had any major write-ups in nearly 7 years. I was employed as the Staff Barber from 2014 until I was shipped out of state. I was also taking full advantage of the Character Based Unit (CBU) since October 2017.

Director Stirling, you won't find absolutely no staff or inmates to say anything bad about me. I had one confrontation with a homosexual sergeant at Ridgeland for making an inappropriate remark, which I'm beginning to believe now this out of state transfer is retaliation from that incident. Other than that I had absolutely no incidents that could be used to label me as being problematic. With that being said, I'm asking you respectfully to transfer me back to the state and restore my level 2 custody status with an apology for this mistake? This transfer has caused an hardship to my parents, myself and my attorney who has been helping me to get another chance at life on the outside of these fences since 2014. I done filed 2 grievances in regards to this unfair transfer with no response to this day, that's why I'm writing you directly. If I'm not transferred back within 14 days, then I will be compelled to seek other means to adjudicate my complaint. Please respond, respectfully,

Joseph Dickerson

JD  
cc: Barney Giese, Esq.